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February 27, 2024

**Via ECF Only**

The Honorable Arun Subramanian  
United States District Judge,  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Stirling Larkin v. Saber Automotive, LLC dba Rezvani Motors  
USDC, SD New York Case No. 1:23-CV-02428-AS  
Joint Letter-Motion to Adjourn Current Trial Readiness Conference  
and Reset the Date**

Dear Judge Subramanian,

The undersigned represents defendants Saber Automotive, LLC (California) and Saber Automotive, LLC (Montana) with regard to the above-referenced matter. This letter motion is presented as a joint request with attorney Justin Gunnell, counsel for plaintiff Stirling Larkin, to adjourn the Trial Readiness Conference currently set for April 4, 2024, and to reset that Conference to a date in late May or early June 2024, depending upon the court's calendar.

Current Trial Readiness  
Conference Date

April 4, 2024

Proposed Adjourned Trial Readiness  
Conference Dates

May 22, 23, 24, 2024  
May 28, 29, 30, 31, 2024  
June 3, 4, 2024

This is the third request to move deadlines. The first request was granted by the court on August 20, 2023 (Dkt 25). The second request was granted by the court on December 13, 2023. The parties are not seeking to adjourn the current trial date of July 8, 2024; rather, just the Trial Readiness Conference. The reasons for this adjournment request of the current Trial Readiness Conference date are as follows:

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(1) The parties have both filed summary judgment motions, the briefing for which will not be concluded until March 14, 2024. Based upon the current Trial Readiness Conference date of April 4, 2024, the parties will be required to complete pretrial submissions one week after the briefing on the summary judgment motions (March 21, 2024), as set forth in par. 10 of the court's Individual Practices in Civil Cases; and

(2) An adjournment of the current Trial Readiness Conference will allow the court to rule on the pending summary judgment motions, and for the scope of the trial to be better brought into focus before the parties begin pretrial preparations in advance of the Trial Readiness Conference.

For these reasons, and for good cause shown, the parties respectfully request that the court grant their joint request to adjourn the Trial Readiness Conference to a proposed date as set forth above.

Very Truly Yours,

SCHIFFER, APC

*/s/Eric M. Schiffer*

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Eric M. Schiffer

cc: Justin J. Gunnell, counsel for Plaintiff Stirling Larkin (Via ECF)

The April 4 conference is rescheduled for  
June 3, 2024, at 4:00 p.m.  
SO ORDERED.



Arun Subramanian, U.S.D.J.  
Date: February 28, 2024